



Standards Without Borders

Global ethical standards alignment for amplified impact:
Textiles reuse, export assurance and EPR readiness

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Figure 1: Kringwinkel warehouse, Antwerpen, Belgium

1. Executive Summary

TRUST is the UK standard for traders in secondhand textiles and household products. It certifies 33 companies, supporting more than 4,000 UK jobs and covering much of the UK's textile exporting capacity. Its charity retail support is significant: signatories representing at least a third of the sector, and more than 3,000 shops.

This report summarises the work of the TRUST Sprint Group and sets out how TRUST should evolve in 2026 to remain credible, practical and policy-relevant in a changing reuse, export and Textiles Extended Producer Responsibility (EPR) landscape.

- understanding TRUST's position relative to comparable international standards
- strengthening thinking on visibility across reuse and export chains
- evaluating TRUST as a quality-control, reporting and EPR-readiness mechanism

The central conclusion is that global reuse markets are under severe pressure, especially at the lower-value end. EPR can help by funding better collection, sorting, reuse, recycling and reporting, but it will only address the real risks if it is designed around existing reuse and export systems, includes destination-market evidence, and it recognises credible voluntary standards such as TRUST.

The Sprint Group drew on seven sprints between February and June 2026, including benchmarking conversations, a Belgium and Netherlands study tour, and comparison with international standards. The work drew direct input from **28 organisations and contributor groups** across the UK, Europe, Australia, Canada, Ghana and Kenya, including reuse networks, charities, Producer Responsibility Organisations (PROs), recyclers, standards bodies, policy specialists, downstream market actors and sector associations.

Headline findings

1. **TRUST has a credible base.** It already provides independently audited ethical and operational standards for UK charity retailers supplying to certified traders.
2. **The wider assurance landscape is fragmented.** Comparable schemes overlap, but none yet offer complete end-to-end traceability.
3. **Market pressures and upstream quality are now central risks.** Rising volumes do not guarantee more reuse if average quality is falling, outlets for lower grades are weakening and usable goods have negative value at the point of collection. Some large European reuse operations already dispose of

- anything they cannot sell in local markets, others report that wearable goods values no longer cover the cost of handling, sorting and onward placement.
4. **Textiles EPR can support domestic reuse, but governance is variable.**
France and the Netherlands show that EPR can formalise reuse and recycling targets and create funding routes for domestic systems. But governance and inclusion remain uneven. Strong re-use sector engagement and voluntary standards (as in Flanders) build confidence, capacity, investment and innovation.
 5. **EPR does not automatically solve export risk.** France and The Netherlands show that funding and reporting can improve system visibility, but downstream assurance can remain weak unless governance, reporting and market incentives explicitly address reuse quality and export suitability.
 6. **There are practical, scalable examples to draw on in key end markets.**
Traceability pilots and collection and clean-up initiatives in Ghana show how destination markets can generate evidence on quality and residual burdens within traded goods, while demonstrating practical routes for remediation and livelihood support. Kenya adds a complementary example of how statutory EPR can connect PROs, recyclers, aggregators and informal-sector waste pickers in recovery networks.
 7. **Goods circularity and footprint should sit alongside material circularity.**
Improved capture rates and recycling are important, but should not become central metrics on their own. Textiles EPR should prioritise reuse, repair, and the avoided social and environmental footprint of keeping goods in use.
 8. **Downstream feedback is the practical next frontier.** Bale-level checks, trader feedback, trusted buyer approaches and clearer destination categories offer realistic progress without over-claiming full traceability.
 9. **International alignment is more useful than proliferation.** TRUST should help build a shared core standard for audit and accreditation, traceability, reporting and EPR recognition.

Priority actions for TRUST

Action	Purpose
Go deeper – sample goods and verify pre-sort/sort quality assurance	Strengthen export assurance by checking that goods, paperwork, pre-sorting controls and sorting outcomes match in practice.
Differentiate – build tiered assurance levels	Keep the baseline practical while rewarding stronger evidence, traceability and performance.

Go further – connect quality controls with downstream insight	Use destination-market feedback to improve grading, market fit and responsible export.
Be clearer – standardise reporting and communications	Improve data capture first, so reporting is more consistent, comparable and useful for EPR readiness, auditability and public confidence.
Go wider – build a shared core standard and mutual recognition	Phased stakeholder engagement plan with international partners, Producer Responsibility Organisations (PROs), policy makers and regulators and to include full reuse chain in future systems, not retrofitted later.

Recommendations for governments, PROs and policymakers Textiles EPR should be designed to build responsible reuse systems, not simply to deliver producer compliance through a recycling and waste-management template.

- Prioritise prevention, reuse, repair and high-quality recycling across borders, rather than treating capture rates or material circularity as the only central metrics.
- Build in visibility from the start, including clear reporting on destinations, non-reuse outputs, reject rates and residual burdens.
- Involve charities, social enterprises, voluntary standard setters, aggregators, recyclers, market traders and informal-sector waste pickers in producer responsibility scheme design.
- Use funding to improve quality, traceability, destination-market evidence, remediation and livelihood protection where exported textiles create burdens.

Recommendations for charities, social enterprises, traders and the wider value chain Organisations that handle the goods and manage the waste, but do not usually set policy, should align around shared evidence and action:

- Align standards and assurance approaches, including quality-control metrics for traded products, destination-market feedback loops, bale testing and shared audit criteria.
- Improve data collection and visibility across the value chain to evidence destinations, quality, residual outputs and responsible handling.
- Use collective advocacy and active dialogue to ensure charity reuse, social value, export responsibility and downstream realities are recognised in take-back schemes, EPR design and international standards development.

Executive message

In the face of fragile markets and increasing scrutiny, standards and accountability become more relevant, not less. TRUST should be EPR-ready, not EPR-dependent: a voluntary pathfinder for sector standards, better evidence, export assurance and international alignment while policymakers design more inclusive textiles EPR. Further delivery should recognise TRUST member capacity and consider additional resourcing where sustained pilots, coordination or standards development are needed.

2. Why standards need to evolve now

2.1 The problem: more material, weaker markets and greater scrutiny

There is a large and long-established global trade in used clothing linking higher-income countries, including the UK, with lower- and middle-income markets. That trade has expanded alongside rising clothing production, lower average garment use and growing concern about the transfer of end-of-life burdens across borders.

For UK charity retailers, these pressures are compounded by weaker markets for unsold stock, geopolitical disruption, volatile shipping routes and higher operating costs. At the same time, increasing volumes of lower-cost, lower-durability clothing are entering the system, making it harder to maintain reuse value and more difficult to manage material responsibly at end of life. Together, these trends strengthen the case for clearer standards, stronger assurance and policy mechanisms that support both waste prevention and credible downstream management.

This is already visible in parts of the European reuse system. Some large reuse operations dispose of anything that cannot be sold through their own local outlets, rather than relying on export to absorb lower grades. Others report that material which is technically wearable can have a negative value at the point of collection once handling, sorting, transport and uncertain resale prospects are taken into account. For TRUST, this makes upstream quality, acceptance criteria and market suitability central assurance questions, not secondary operational details.

Key insight

Collection growth is not the same as reuse impact. Standards need to evidence quality, market fit and responsible handling after first sale.



Figure 2: Charity retail (North London Hospice)

2.2 The assurance gap: what TRUST already does



[Textile Recycling Universal Standard](#) (TRUST) was established by charity retailers in 2018 to provide independent assurance over traders' legal compliance, health and safety, fair employment practices and environmental responsibility. It was designed to address risks in the sector that were not covered by any existing mandatory inspection or licensing regime.

TRUST currently covers 33 companies trading in textiles, bric-a-brac and books, including most of the UK's textile graders and a significant share of exported goods, employing over 4,000 people in the UK. While it remains a UK-based standard, its strategic value lies in providing a coherent and defensible framework for charity supply chain scrutiny, with growing ambition to extend assurance further into reuse and export chains.

Signatories covering approximately a third of the charity retail sector, over 3,000 shops, undertake to trade only with TRUST certified businesses. There is evidence from charity retail and local authority surveys that there is broader recognition of the standard. This promotes legitimate re-use trade and drives business towards companies demonstrating good practice.

2.3 Why EPR changes the stakes

Extended Producer Responsibility (EPR) schemes are intended to ensure that those placing goods on the market contribute to the costs of managing them at end of life. For textiles, this

means supporting better product design, stronger collection and sorting systems, and fairer cost recovery for reuse, recycling and residual management.

Some European countries, including France, Hungary, Latvia and the Netherlands, already have legislation in place, while others including Italy are close to finalising proposals and all EU member states are due to have operational textiles EPR systems by 2028.

The Refashion PRO in France represents a mature textiles EPR model in practice, including downstream traceability and export assurance. Refashion has operated France's textiles EPR scheme since 2008 and therefore provides the most established comparator for TRUST as it considers EPR readiness and future standards development. It has driven innovation and underwritten core functions within the used clothing value chain. The objective of including Refashion in this work was not to present France as a complete model to replicate, but to test what a mature EPR system does well, where visibility and quality assurance remain limited, and what lessons TRUST can draw for shared definitions, reporting, practical audit criteria and downstream evidence.

Refashion shows that textiles EPR can create formal reuse targets, accredited separate collection and sorting networks, reporting duties and funding support for operators under pressure. However, the call also showed that even a long-established scheme can remain weak beyond first-tier reporting: traceability is largely lost after brokered sale, quality is not directly measured, sorting definitions are not standardised, and export assurance is not yet linked to robust multi-tier verification. The lesson for TRUST is that EPR funding and reporting are useful, but they do not remove the need for practical quality assurance, shared definitions and downstream evidence.

Textiles EPR is being shaped by competing expectations. One approach emphasises improving circularity of materials in the country of first use, often linked to tighter quality criteria and restrictions on export. Another focuses on improving performance across complex international value chains, recognising that circularity of goods and potential for material capture as well as end-of-life burdens frequently cross borders and continents. For the UK the policy direction remains unsettled, for much of the EU it is progressing but unevenly. The debate increasingly points to the need for assurance systems that are credible, internationally relevant and capable of supporting both domestic and exported traded goods and waste flows.

3. What we set out to do

Method in brief

This report draws on benchmarking calls, a Belgium and Netherlands study tour, standards comparison and review of end-market reporting. It should be read as a targeted sector scan rather than a comprehensive global market study.

This research study aims to clarify the priority areas for the development of the TRUST standard in 2026, ensuring it remains credible, future-proof and capable of supporting both reputation management for the textile sector and potential integration with future UK Textile EPR frameworks.

To ensure the certification is fit for the future, TRUST is looking at how the audit can be improved, what best practice looks like, what EPR looks like in Europe, and how the audit compares with others globally, ensuring alignment where appropriate.

- **To understand TRUST's position relative to international standards** – undertake a structured comparison between TRUST and three relevant reuse and export standards to determine areas of equivalence, where TRUST is stronger, where improvements are needed, and opportunities for alignment or mutual recognition.
- **Strengthen visibility across the value chain** – enhance expectations for visibility and transparency of next-tier operations, particularly sorters, graders and exporters, focusing initially on what participants in the chain know of next tiers before extending to wider transparency requirements.
- **Evaluating TRUST's credibility as a quality-control, reporting and EPR-readiness mechanism** – position TRUST as the benchmark for responsible trading within the charity re-use sector by clarifying minimum performance requirements, improving data capture and promoting consistent auditing across traders.

Expected outcomes of this research project:

- A revised and strengthened TRUST standard with minimum and gold performance levels and enhanced visibility and transparency expectations.
- A final report summarising comparison with international standards and recommendations for adoption and mutual recognition.
- A credible pathway to EPR alignment informed by existing systems, EU standards and relevant position papers.

Drivers for this focus:

- **Reputational Protection:** ensuring charities can confidently engage with commercial partners to avoid exposure to unethical practices.
- **Stock Generation:** reassuring donors and the public that end uses are responsible, strengthening the long-term supply of pre-loved stock.
- **EPR Readiness:** ensuring TRUST can serve as a credible quality control or cost-modulation mechanism if the UK Government introduces Textiles EPR.
- **International Consistency:** reducing duplication, aligning with comparable schemes and enabling mutual recognition across borders and credibility for UK goods in global markets.

A TRUST Sprint Group made up of representatives of British Heart Foundation, Salvation Army Trading Company Ltd (SATCoL), Barnardos, North London Hospice, Oxfam, the Charity Retail Association and CTR Group drove this workstream over the period Feb-Jun 2026. This study was structured around seven sprints. It uses a variety of research methodologies:

- **A:** A series of benchmarking calls
- **B:** A Study Tour of Belgium and the Netherlands
- **C:** AI assisted comparisons of standards and reporting



Figure 3: Kringwinkel, Vilvoorde, Belgium

4. What we learned

4.1 Upstream learnings: common risks, different systems

Theme	What we heard	Why it matters for TRUST
Collection	Volumes are rising, but average quality can fall when collection grows faster than sorting capacity.	Collection metrics need to be linked to quality, market fit and residual handling.
Export	Visibility often drops after first sale, especially where goods move through brokers or aggregated routes.	TRUST should strengthen next-tier evidence and risk-based reporting.
Standards	Assurance is fragmented, with overlapping schemes and different terminology.	A shared core standard could reduce duplication and support mutual recognition.
EPR	Funding may reshape market access and definitions of acceptable performance.	TRUST should be EPR-ready and able to evidence responsible reuse and export.

The benchmarking exercise drew on networks and organisations with direct experience of textile reuse standards, export practice, market oversight and Extended Producer Responsibility. It was not intended to be a full global market review. Its value is in identifying recurring patterns across different systems and drawing out practical implications for TRUST.



Figure 4: TRUST Sprint Group with Opnieuw & Co and Agricon, in Mortsel, Belgium

Across the conversations, five themes recurred: rising collection volumes but falling average quality; weak visibility beyond first sale; reliance on export markets; fragmented and uneven assurance; and growing interest in EPR as a funding mechanism for better sorting, reporting and downstream accountability.

The most consistent message was that collection volume is a poor proxy for reuse impact. Separate collection and take-back schemes can increase the quantity of material entering the system, but if quality falls or sorting capacity does not keep pace, more material is pushed towards lower-value outlets, export pressure or residual management. Contributors with downstream exposure therefore placed more emphasis on incoming quality, market absorption, residual handling and whether goods are genuinely fit for the markets they reach.

Systems with clearer policy frameworks or social-economy infrastructure can provide useful lessons, but the broad pattern is similar across many exporting countries: charity and social-sector collection remain important, domestic reuse is limited by market capacity, and most material that cannot be sold locally depends on export, downcycling or other lower-value routes. Fibre-to-fibre recycling remains marginal in practice. This reinforces the need for standards to focus less on national comparison for its own sake and more on the evidence required to show responsible handling across routes.

Benchmarking reinforced that grading is not merely a technical process. Where grading is externalised to lower-cost hubs, visibility can reduce at the point where value is allocated and risk is transferred. Upstream actors tend to see grading as quality assurance and market allocation; downstream actors can experience it as the point at which unsuitable or low-value material becomes their problem. TRUST therefore needs stronger ways to test whether goods sold as reusable are actually aligned with destination-market demand.



Figure 5: Kringwinkel Sorting Facility, Antwerpen, Belgium

Full downstream traceability remains rare. Visibility typically drops sharply after the first commercial transaction because of commercial sensitivity, aggregation, informal market

structures and limited data capability. A proportionate standard should avoid over-claiming full chain of custody where that is not realistic but should still improve what is knowable and auditable: next-tier destinations, broad outlet type, quality controls, residual routes and evidence of responsible handling.

Examples of incremental improvement included better customs classifications, , buyer or market feedback, random bale checks, fibre scanning and shared audit criteria. None of these solves traceability alone, but together they point towards a practical improvement pathway for TRUST: stronger sampling, clearer reporting categories and structured feedback loops from receiving markets.

Reputational risk was strongly associated with export rather than domestic reuse. Common concerns included perceptions of waste dumping, labour conditions in grading hubs, environmental impacts at destination, prohibited or unsuitable items entering export streams, opaque pricing and weak evidence to counter negative media narratives. The response should not be defensive communication alone, but better evidence of quality control, destination fit and responsible management of non-reusable fractions.

Financial pressure is also increasing. The used clothing trade remains largely market-financed through resale value, but declining export revenues, rising sorting costs and falling average quality are narrowing margins. This is why EPR was repeatedly discussed not only as a waste-management policy in the country of first use, but as a possible source of funding for infrastructure, reporting, innovation and fairer support to actors who manage residual burdens in importing countries.

The standards landscape is active but fragmented. Most frameworks emphasise process assurance rather than outcomes, and none yet provide complete end-to-end traceability. The opportunity for TRUST is therefore not to duplicate every emerging model, but to define a credible shared core and add practical modules for downstream visibility, bale quality, trusted buyer recognition, reporting and EPR readiness.

EPR maturity varies widely. France and The Netherlands offer the clearest examples of textiles EPR in operation or early implementation, but even their downstream visibility remains limited beyond first-tier reporting and export flows are not fully addressed. Other countries are earlier in the policy cycle.

Case study: Italy — bale checks and exporter/importer assurance

TWM-Textile Waste Management in Italy places stronger emphasis on the physical quality of goods, not only on process compliance. The approach combines commercial process evaluation with unannounced checks of random bales against specification, alongside downstream feedback on whether contents match what was sold. It also points towards an EPR-linked model being developed by the PRO Retex

Green in which approved export channels could be supported if both exporter and importer controls are credible.

Case study: Canada — buyer registry and lighter-touch assurance

Canada offers a different but useful reference point. Assurance remains lighter touch than the Italian model, with greater reliance on codes of conduct, organisational standards and buyer expectations. However, the emerging NACTR buyer registry could become a practical route for recognising pre-approved downstream buyers and improving confidence in where material goes after first sale.

The practical lesson is that EPR may create funding and reporting obligations, but it does not automatically create reliable assurance over reuse quality, separation of recycling grade-only items, export suitability or residual management.

There was strong convergence around practical collaboration: aligning audit criteria, agreeing shared terminology, learning from downstream partners, consulting standards bodies and trader associations, and testing quality feedback mechanisms. These are more useful than adding another layer of parallel standards activity. For TRUST, the priority is to use its credibility in the UK charity sector to support mutual recognition, shared audit content and proportionate evidence requirements.

Overall, the benchmarking points to a common challenge rather than a set of neatly different national stories: partial visibility, declining quality, export dependence, fragmented assurance and uncertain funding. The implication is clear. TRUST should strengthen practical evidence of quality, destination fit and downstream responsibility, while working with partner standards to avoid duplication and build a shared core for responsible reuse and export.

4.2 Belgium and the Netherlands: policy, reuse and market pressure

After the benchmarking calls, four TRUST members from different charity retailers undertook a study tour to Belgium and the Netherlands. The visits explored reuse infrastructure, textile EPR, social-economy models, sorting practice, market pressure and policy-linked funding, and provided practical insight into how standards, traceability and reuse outcomes are being shaped in neighbouring systems.

Participants in Visits (20th – 24th April 2026):

David Roman – Sustainability Manager, British Heart Foundation

Bernie Thomas – Circular Economy & Sustainability Manager, Salvation Army Trading Company

Emily Cronin – Head of Retail, North London Hospice

Abigail Birtles – Sustainability Manager, Barnardo's

Organisations visited included RREUSE, Kringwinkel Vilvoorde, Herwin, Kringwinkel Antwerpen, Opnieuw & Co Mortsel, Opnieuw & Co Dordrecht, Collectief Circulair Textiel, Branchevereniging Kringloop Nederland, Agricon and ReShare Rotterdam (see Appendix A)

Textiles EPR in the Netherlands was introduced in July 2023 and is being updated to align with the amended EU Waste Framework Directive. The Dutch system formalises reuse within EPR and shows how PROs, funding routes and eligibility criteria can shape market access, while also highlighting continuing challenges around transparency, recycled fibre demand, fee competition and the practical interpretation of preparation for reuse.

Case study: Netherlands — tiered textiles EPR targets

The Netherlands sets a stepped hierarchy of performance targets that moves beyond a single collection metric. By 2025, producers must ensure that 50% of the previous year's textiles placed on the market is prepared for reuse or recycled, rising to 75% by 2030. Within this, specific targets cover reuse overall, reuse in the Netherlands and fibre-to-fibre recycling escalating from 2025 to 2030:

- 50% by weight Placed On Market prepared for re-use/recycled, rising to 75%
- 20% prepared for re-use, rising to 25%
- 10% prepared for re-use in Netherlands, rising to 15%
- 25% of recycling is fibre to fibre, rising to 33%

The structure implies a policy preference for domestic reuse, reuse overall, high-quality recycling and fibre-to-fibre outcomes rather than undifferentiated collection alone.

The BKN and RWS discussions added important nuance. The Netherlands is ahead in treating reuse as a regulated EPR outcome, but assurance remains centred on producer obligations, aggregated reporting and domestic quality marks rather than a national reuse or export certification system equivalent to TRUST. Three competing PROs are shaping funding and service agreements, and cost pressure may encourage lower-cost routes that do not fully address low-grade or non-reusable textiles.

Case study: Reuse shops and sorting facilities in Flanders

Flanders visits highlighted mature reuse infrastructure with strong links between collection, sorting and second-hand retail, and municipal contracts enabling investment in sizeable stores and sorting facilities. However, a sharper market lesson: export was far less viable than in the past. Goods without local demand were increasingly difficult to place, and domestic operators were having to absorb more pressure without an EPR mechanism to offset costs.



Figure 6: Kringwinkel, Vilvoorde, Belgium

The Herwin benchmarking call added specific EPR detail. Flemish textiles EPR is being debated, with a local reuse target considered likely and implementation being discussed for early 2028. Retexbel has already been established by retailers as the Producer Responsibility Organisation, while the social sector currently has a single non-voting observer seat on the Retexbel board. Herwin also noted that TESS is arguing for recognition of its standard as a prerequisite for EPR funding for reuse.

Key insight

Reuse-led EPR has greatest value when it strengthens existing reuse systems, not just collection. The Netherlands shows how reuse targets and funding routes can shape market behaviour, while Flanders points to the importance of strategic partnership between PROs, the social economy and recognised standards.

4.3 Downstream evidence and end-market examples

The value chain was consistently described as fragmented and multi-actor, involving charities, social enterprises, collectors, graders, exporters, importers, traders, repair and resale actors, recyclers and PROs. Risk and value are not evenly distributed: upstream organisations are often most concerned with reputation and compliance, while downstream actors are more exposed to oversupply, poor incoming quality, unsaleable fractions and limited waste-management infrastructure.

The Landfills2Landmarks conference in Ghana highlighted several emerging approaches to improving sorting and traceability. New Retex demonstrated AI-enabled identification of garments, including origin, likely value and material composition, while Bale Index and Live Bale Labs showed how bale-level monitoring, trader feedback and fibre composition data can generate a clearer picture of what is exported and how goods perform in market. Together,

these approaches point to more data-rich systems for improving quality control, identifying off-spec items earlier and strengthening end-to-end transparency.



Figure 7: Landfills2Landmarks, Ghana

Standards Several elements were relevant to upstream standard setting. Presentations and discussions touched on traceability, material identification, reject rates and the management of off-spec or unsaleable goods, all of which are important building blocks for a more robust export standard. The conference also sparked discussion of a co-designed approach linking upstream grading with downstream market feedback, bale testing against specification, and clearer evidence on whether goods sold as reusable are genuinely fit for market.

There were also references to wider standard development through TRUST and Refuture, including the ambition to build a broader and more globally applicable framework for responsible textile re-use and export.

EPR The conference also surfaced a broader EPR question: if producer fees are paid in Europe, should a proportion of that value support destination markets where residual burdens are actually managed?

Case study: Ghana — destination-market reality and voluntary action on textiles
Ghana shows how export risk is experienced at destination. Market actors, importers, NGOs, recyclers and trader networks deal directly with oversupply, poor-quality incoming goods and residual fractions that cannot be resold. Landfills2Landmarks discussions focused on linking upstream grading with downstream feedback, bale testing against specification and tech-driven innovation. Initiatives such as Kanta Keepers and Tide Turners show how funding can support waste capture, remediation and livelihoods in a used-clothing destination market.
Case study: Kenya — EPR infrastructure and informal-sector integration
Kenya is a useful reference model because there is already an EPR system in place which technically includes textiles. The packaging recovery system has created practical experience in PRO registration, aggregation, subsidy flows, reporting and material recovery. Although textiles are not yet operating at the same maturity, the Kenyan model shows how future textiles EPR could connect formal PRO structures with existing informal and semi-formal recovery networks.
Key insight Destination markets should be part of EPR design, not an afterthought. Ghana shows how bale-level feedback, traceability pilots and clean-up initiatives can evidence quality, reject rates and residual burdens while supporting remediation and livelihoods. Kenya shows how statutory EPR can connect PROs, recyclers, aggregators and informal-sector waste pickers into practical recovery networks.

4.4 Standards comparison: where TRUST should align and where it should lead

Area	Current TRUST strength	Development opportunity
Ethical and legal baseline	Established, independently audited and embedded in UK charity trade.	Maintain as the foundation level of the standard (see Appendix C).
Sorting and grading assurance	Provides trader-level scrutiny.	Add clearer criteria for market suitability, destination fit, pre-sorting controls, sorting quality assurance and product bale quality, with quality assurance named as an explicit audit output.

Downstream visibility	Provides some first-tier accountability.	Introduce risk-based next-tier reporting, buyer feedback and sampled verification.
EPR readiness	Credible voluntary framework with sector legitimacy.	Map criteria to emerging EPR end market reporting categories and robust evidence which enables cost-modulation .
International alignment	Recognised social-purpose standard in the UK charity context.	Develop a shared core with partner values, standards and optional local modules.

The comparison work suggests that TRUST already covers a strong core of issues that matter most to UK charity retailers: legal compliance, health and safety, fair employment, environmental responsibility and basic due diligence over trading partners. It remains a robust upstream assurance mechanism because it is established, independently audited and embedded in real commercial practice across a significant share of the UK charity textile market.

Other models point to three development opportunities. Refuture places greater emphasis on sorting-facility performance, market suitability and feedback from receiving markets. TESS and related European discussions place more weight on interoperability with public policy, including links to reuse targets, reporting categories and future EPR eligibility. The Italian model described by TWM adds a practical test-based element through unannounced bale sampling and importing-market feedback. TRUST does not need wholesale reinvention; it needs targeted strengthening in downstream visibility, comparability, quality control and policy relevance.

There is meaningful common ground across standards, even where terminology, geography or governance differ. Most address responsible handling, credible oversight, minimum quality expectations and better visibility beyond first sale. This creates a realistic basis for alignment or mutual recognition around core criteria, with optional modules for traceability, exporter and grader assurance, reporting and EPR readiness.

Shared core across the four frameworks

Responsible handling · legal and ethical compliance · quality expectations · credible oversight · visibility beyond first sale · evidence of market suitability

Frameworks and distinctive contribution

TRUST	TWM	TESS	Refuture
UK	Italy	Flanders/Europe	Australia
Exporter	Exporter · sorter · importer	Exporter · sorter	Sorter / next tier
Established third-party audit		Established third-party audit	

<i>Charity legitimacy and EPR-ready base</i>	<i>Established third- party audit Bale checks and importer feedback</i>	<i>EPR funding and reuse targets</i>	<i>Developing voluntary guidelines Overseas sorting assurance</i>
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Reporting comparison points in the same direction. TRUST is not alone in having partial visibility after the first commercial transaction, and full multi-tier traceability remains rare across the sector. Taking sorting as the priority point for focus – inputs might come from multiple traders in different countries each with multiple sources, outputs will go to multiple customers. From a charity retail, local authority or retailer takeback perspective this is tier 2 or 3 downstream, but full mapping would entail several more tiers to the point of final retail or disposal. Other systems are beginning to set clearer expectations around destination categories, mass-balance style reporting, buyer or market feedback, and evidence that goods are suitable for the markets they reach.



Figure 8: RREUSE member meeting, Brussels

The Netherlands work also showed that EPR reporting and audit assurance do not necessarily evolve together. The visible reporting framework appeared relatively simple and largely focused on first-tier destinations, with limited adjustment for downstream non-reuse end markets or losses. No clear equivalent of a published, uplifted audit standard linked to variable producer fee modulation was identified through this work.

For TRUST, the priority is not to promise complete end-to-end traceability where that is unrealistic, but to improve what is knowable and auditable: next-tier destinations, outlet type, broad destination routes, evidence of responsible handling and expected routes for material that is not reusable.

The wider EPR question is what additionality these schemes deliver. Evidence gathered here suggests that support has mainly taken the form of modest subsidies for collection, sorting and export handling, with more substantive payments linked to recycling evidence. France illustrates both the strengths and limits of current practice: formal funding and recognition of reuse exist, but downstream traceability remains weak beyond first-tier reporting while quality

decline and falling resale values place growing pressure on collectors, sorters and municipalities.

Case study: Australia — voluntary EPR and extending standards across borders

Australia provides a useful combined reference point because its system brings together emerging voluntary EPR, charity-sector export assurance and global sorting-facility standards. Seamless shows both the potential and limits of voluntary EPR: it aims to fund reuse, repair and recycling, but low brand participation, limited sorting capacity and weak recycled-fibre to date demand mean regulation may well be eventually needed. Charitable Re-use Australia adds a practical assurance route by extending standards to selected overseas graders and capturing material usage at destination. Refuture complements this with global sorting-facility guidelines covering social, environmental and trade pathways, with self-assessment, independent audit and star ratings.

A proportionate model for TRUST would combine foundation-level reporting that secures basic visibility of next-tier destinations and controls with gold-level reporting that goes further on verification, feedback loops and multi-tier evidence where operators can genuinely provide it. Stronger reporting should align standards where possible and amplify impact where better evidence and downstream practice can be demonstrated.

5. The strategic case for TRUST's next phase

This project set out to understand TRUST's position relative to comparable international standards, strengthen thinking on visibility across the value chain, and test how far TRUST can function as a credible quality control mechanism in an evolving EPR context. The research suggests that these objectives were met in a useful and grounded way. It has confirmed that TRUST already provides a credible ethical and operational baseline for UK charity retailers, while also showing more clearly where its limits currently sit, particularly in relation to downstream visibility, reporting consistency and formal alignment with emerging policy frameworks.

What has been learnt most clearly is that the challenge is not a lack of standards activity, but a lack of shared structure. Across the work, the same structural issues recurred: fragmented assurance, limited downstream visibility and growing pressure for systems that are practical for operators and credible to policy makers and the public.

The Belgium and Netherlands visits reinforced this picture by showing how quickly market conditions can shift when export outlets weaken and policy-linked actors gain greater influence over funding, eligibility and performance expectations.

Kenya and Ghana add a different and important lesson about what EPR could achieve if designed as system-building rather than narrow producer compliance. Kenya's existing EPR framework, currently more mature for packaging than textiles and operating in-country, shows how formal PRO structures can work with recyclers, aggregators and informal-sector waste pickers to increase capture where formal waste management coverage is partial. In Ghana, initiatives such as Kanta Keepers and Tide Turners are only loosely a form of voluntary cross-border EPR, but they point to a complementary model in which funding can support waste capture, remediation and livelihoods in destination markets.

Together, these examples suggest that future textiles EPR should build from the actors already handling material on the ground and consider how funding can follow responsibility across borders, rather than stopping at collection, reporting or producer compliance in the country of first use.

Italy also pointed to a practical next step: stronger assurance based on bale testing and structured downstream feedback, alongside EPR-linked models that could direct more value through approved export channels.

This suggests that TRUST's future value lies not in trying to promise perfect traceability or a wholly new model, but in building from its existing strengths and adapting them in ways that better reflect international practice, downstream realities and likely EPR expectations. That is particularly important because TRUST appears to be regarded not simply as another voluntary scheme, but as a comparatively trusted and socially relevant framework whose charitable roots give it legitimacy beyond narrow commercial assurance. This creates a platform from

which it can help coordinate common audit and traceability content across related standards, rather than operating in isolation.



Any next phase also needs to be realistic about resourcing. TRUST is carried forward by members alongside their main roles and without dedicated remuneration, so further development should be proportionate to the in-kind capacity available and linked to exploration of additional funding where more sustained delivery is required.

Recent international policy developments reinforce the urgency of this agenda. Emerging legislation and standards in jurisdictions including California, Chile and Germany, alongside wider changes under the Basel Convention, UK and EU waste shipment rules and related technical standards, point to a tighter external environment for textile reuse, exports and EPR. In England, growing Environment Agency interest in used textiles exports adds a further domestic driver for clearer evidence on whether goods are genuinely reusable, properly sorted and legally described before shipment. Across the EU, the same direction of travel is visible through stronger interest in definitions, sorting guidance, reporting requirements and export controls. TRUST audits and advice should therefore help traders understand, prepare for and benchmark against these expectations, not simply demonstrate compliance with today's baseline.

6. A practical roadmap for TRUST and partners

The findings point to a clear practical agenda for action. To make the implications easier to use, the report's next-step material is recast here as a set of recommendations:

- first, actions that TRUST can pursue directly with partners
- second, issues that governments, Producer Responsibility Organisations and policymakers should consider
- third, actions for wider sector partners and stakeholders

This structure matters because the evidence suggests the future of textile reuse and export standards will be shaped not only by what TRUST does itself, but also by how funding, eligibility, reporting expectations and market access are designed by others. Delivery should therefore be phased around member capacity and supported by external funding where pilots, coordination or standards development require sustained resource.

6.1 Recommendations for TRUST

Recommendation	Owner	Timing	Priority	Expected impact
Go deeper – sample goods and verify pre-sort/sort quality assurance	TRUST and certified traders	2026	High	Strengthens assurance that goods, paperwork, pre-sorting controls and sorting outcomes match in practice.
Differentiate – build tiered assurance levels	TRUST	2026	High	Maintains practicality while rewarding stronger evidence, traceability and leadership.
Go further – connect quality controls with downstream insight	TRUST, traders and downstream partners	2026	High	Tests practical downstream assurance, market feedback and bale-quality evidence.
Be clearer – standardise reporting and communications	TRUST and certified traders	2026–27	Medium	Improves comparability, auditability, EPR readiness and public confidence.
Go wider – build a shared core standard and mutual recognition	TRUST, CRA and sector partners internationally	2026–27	High	Reduces duplication and ensures reuse and export assurance are recognised in future systems.

6.1.1 Go deeper – sample goods and verify processes

- Strengthen assurance by moving beyond document review alone and introducing more practical checks on goods, processes and export readiness.
- Provide clearer guidance for signatories and traders on removing identifiable waste before transfer, applying consistent terminology for goods passed to traders, and preparing for greater Environment Agency and EU scrutiny of used textiles exports.
- Develop or share sample trader SOPs for export compliance, including checks against regulator guidance and market suitability.
- Make quality assurance of both pre-sorting and sorting a named output from TRUST audits, including evidence of how traders control incoming quality, exclude unsuitable material and match graded outputs to market requirements.
- Introduce unannounced sampling of goods against agreed criteria and verify that export paperwork is consistent with goods on site.

6.1.2 Differentiate – build tiered assurance levels

- Retain a practical baseline while creating a clearer distinction between Foundation and Gold levels.
- Foundation should provide legal compliance, baseline exporter and grading assurance, and minimum downstream knowledge.
- Gold should require enhanced traceability, stronger verification, better evidence of downstream outcomes and criteria suitable for future EPR recognition or cost modulation.
- Use the tiered model to distinguish routine compliance from stronger leadership on traceability, verification, reporting and market-facing quality evidence.

6.1.3 Go further – connect quality controls with downstream insight

- Move from simply knowing the next tier to building structured learning loops from downstream markets.
- Set realistic traceability expectations beyond first sale where evidence can genuinely be obtained.
- Introduce formal feedback mechanisms from end markets, including trader feedback on whether bale contents match specification and digital tools where proportionate.
- Pilot an IDEAL Bale co-design approach linking upstream grading with downstream market feedback, random bale testing against specification and evidence that goods sold as reusable are actually fit for market.
- Use destination-market insight to improve grading, audit criteria and continuous improvement.
- Phase this work against realistic member capacity and explore proportionate external funding for coordination, pilots and standards development where needed.

6.1.4 Be clearer – standardise reporting and communications

- Standardise reporting categories and core data fields on material flows so results are more consistent, comparable and useful across operators.
- Pilot or phase in quarterly returns to improve the timeliness, consistency and practical usability of reporting.
- Over time, explore whether audit outcomes and flows of goods and waste could be shared across participating schemes on a membership basis through a common reporting approach or platform, improving collective assurance and reducing duplication for operators active across several supply chains.
- Use reporting to strengthen visibility of destinations, non-reuse outputs and key risk indicators, without over-claiming full end-to-end traceability where that is not yet realistic.
- Build a communications plan that turns better data into clearer messages for charities, donors, policymakers and wider stakeholders, helping TRUST explain impact, evidence responsible practice and respond to reputational risk.

6.1.5 Go wider – build a shared core standard and mutual recognition

- Build a phased stakeholder engagement plan with partner standards, Producer Responsibility Organisations, regulators and national charitable associations so that TRUST can help shape, rather than simply respond to, future expectations around responsible reuse and export.
- Progress TRUST from a primarily UK-focused scheme to an internationally relevant standard, beginning with priority downstream and partner geographies where there is active engagement or clear strategic relevance, including Ghana, France, Italy, Ireland, Australia, Canada and the US.
- Develop formal collaboration mechanisms with existing partner organisations in Australia, mainland Europe, Ireland and Canada to pursue a shared objective of alignment and mutual recognition around a common core for responsible reuse and export.
- Use Canada as an early alignment case by comparing TRUST with the emerging NACTR buyer registry model and exploring whether shared criteria could support sampling, bale-quality evidence and downstream visibility.
- Work towards a model in which overseas graders and sorters receiving unsold stock from multiple charities or wholesalers can be audited once against a shared core standard, rather than multiple times against similar schemes.

6.2 Recommendations for governments, PROs and policymakers

At the time of preparing this report, the UK Government had not yet released the Circular Economy Growth Plan or any detailed proposal for textiles EPR. The practical course is therefore to be EPR-ready without becoming EPR-dependent. Reputational, ethical, export-

assurance and regulatory pressures remain whether or not UK EPR arrives soon. Policymakers should also consider the risk that other European countries may begin financially supporting export-facing reuse trade while the UK does not. Textiles EPR should therefore be designed around the existing reuse sector and its cross-border realities, not simply adapted from a waste-management template after the main architecture has been set.

- Design textiles EPR to support responsible reuse systems, better environmental and social outcomes, and confidence for investment and innovation, not only producer compliance.
- Prioritise the top of the waste hierarchy: prevention, reuse, repair and high-quality recycling before lower-value recovery or disposal.
- Build in visibility from the start. Require clear reporting on destinations, non-reuse outputs, residual burdens and the evidence used to support reuse or recycling claims.
- Recognise credible voluntary standards as complements to EPR and regulatory oversight, especially for exporters, grading facilities, cross-border reuse flows, clearer definitions, sorting guidance, reporting requirements and evidence of goods circularity, footprint reduction and market suitability.
- Involve the key players already handling material: social enterprises, aggregators, recyclers, market traders and informal-sector waste pickers.
- Use EPR funding to improve quality, traceability, destination-market waste capture, remediation and livelihood protection where exported textiles create residual burdens.

6.3 Recommendations for charities, social enterprises, traders and the wider value chain

These recommendations are aimed at organisations that handle the material in practice but do not usually decide the shape of EPR policy: charities, social enterprises, collectors, sorters, graders, traders, exporters, importers, recyclers, reuse operators and downstream market partners.

- Align standards and assurance approaches, including quality-control metrics, destination-market feedback loops, bale testing and shared audit criteria, rather than creating further overlapping schemes.
- Improve data collection and visibility across the value chain, including participation in pilots such as bale standards development, traceability feedback loops, destination reporting and clearer evidence of residual outputs.
- Use collective advocacy and ongoing dialogue to influence retailers, policymakers and standards bodies, strengthen the position of charity reuse within take-back and EPR systems, and articulate social value, export responsibility and downstream realities alongside environmental outcomes.

Appendix A: Organisations visited

- **Reuse and Recycling European Union Social Enterprises (RREUSE)** – a European network representing social enterprises active in reuse, repair and recycling, with 34 member organisations across Europe, representing around 1,300 social enterprises and handling approximately 1.3 million tonnes of goods annually for reuse, with around 120,000 employees and volunteers.
- **Kringwinkel (Vilvoorde, Belgium)** – a local Belgian reuse shop and sorting operation visited as part of the study tour to understand practical approaches to collection, sorting and resale.
- **Kringwinkel (Antwerpen, Belgium)** – a social economy reuse organisation operating second-hand retail alongside collection and sorting, with 14 shops, an online presence and more than 600 colleagues, including supported employment roles.
- **Herwin (Flanders, Belgium)** – the industry association for the reuse sector in Flanders, providing sector coordination and insight into separate collection, domestic reuse and policy development.
- **Opnieuw & Co (Mortsel, Belgium)** – a Flemish circular economy enterprise focused on reuse through collection, sorting and second-hand retail, employing more than 500 people.
- **Opnieuw & Co (Dordrecht, The Netherlands)** – part of the wider Opnieuw & Co model, providing additional insight into sorting and grading practice in a Dutch context.
- **Collectief Circulair Textiel (CCT) (The Netherlands)** – one of three Dutch Producer Responsibility Organisations for textiles, with an emphasis on transparency and social and environmental outcomes, representing more than 50 brands and organisations.
- **Branchevereniging Kringloop Nederland (BKN) (The Netherlands)** – the Dutch industry association for the reuse sector, with 65 member organisations, 250 locations, around 144,000 tonnes of goods collected annually, and more than 17,000 people engaged across the sector.
- **Agricon (Breda, The Netherlands)** – an industry supplier active in cradle-to-cradle recycling and circular economy solutions, providing insight into technical and commercial feasibility for textile recycling.
- **ReShare (Rotterdam, The Netherlands)** – part of Salvation Army Netherlands, with around 26,000 tonnes collected annually across 17 shops and more than 300 employees, offering practical insight into front-of-house quality control, pricing and merchandising.

Appendix B: Glossary

Lansink's Ladder – A waste hierarchy widely used in Europe to rank environmental preference, prioritising prevention, reuse and recycling above energy recovery and disposal.

PRO (Producer Responsibility Organisation) – An organisation established to help producers meet their EPR obligations, typically by managing collection, reporting, funding and compliance activity on their behalf.

EPR (Extended Producer Responsibility) – A policy approach under which producers contribute to the costs of managing products at end of life, often including collection, sorting, reuse, recycling and residual treatment.

F2F (Fibre-to-Fibre recycling) – Recycling processes that recover textile fibres so they can be used as feedstock for new textile products, rather than being downcycled into lower-value applications.

EfW (Energy from Waste) – The recovery of energy through the treatment or combustion of waste materials that cannot be reused or recycled.

Traceability – The ability to identify and evidence where materials, products or batches move through a chain, including who handles them and what happens at subsequent stages.

Interoperability – The ability of different standards, systems or reporting approaches to work together, allowing shared understanding, comparability and possible mutual recognition.

Preparing for reuse – Checking, cleaning, sorting, repairing or otherwise preparing products or materials so they can be reused without becoming waste.

Appendix C: Indicative foundation and gold assurance model

Foundation Level

- Designed to ensure baseline responsibility, reduce reputational risk and protect stock supply in the charity system. Possible inclusions:
- Some downstream visibility – minimum next tier country and process
- Evidence of responsible handling
- Compliance with domestic regulations
- Basic reporting of input and output tonnages by category
- Minimum documentation requirements for export partners

Gold Standard – Leadership Level

- For operators demonstrating high integrity, visibility, transparency and strong due diligence – suitable for future EPR cost-modulation or funding. Possible inclusions:
 - Enhanced traceability across multiple tiers where evidence can be verified
 - Robust audit trail and third-party verification
 - Data provision suitable for EPR frameworks
 - Independent unannounced spot-checks
 - Demonstrated contribution to circularity and material recovery outcomes

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